

JACOBS & BARBONE, P.A.

EDWIN J. JACOBS, JR.
ejacobs@jacobsbarbone.law
LOUIS M. BARBONE
lbarbone@jacobsbarbone.law

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1125 PACIFIC AVENUE
ATLANTIC CITY, NEW JERSEY 08401
PHONE: (609) 348-1125
FAX: (609) 348-3774
WEBSITE: WWW.JACOBSBARBONE.LAW

JOEL S. JUFFE
jjuffe@jacobsbarbone.law
DAVID CASTALDI
dcastaldi@jacobsbarbone.law

April 15, 2021

Via ECF

Magistrate Judge Ann Marie Donio
United States District Court
Mitchell H. Cohen Bldg. & United States Court House
4th & Cooper Streets
Camden, New Jersey 08101

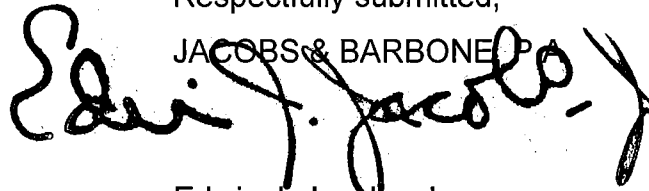
Re: Marty Small and LaQuetta Small v. Craig Callaway, et al.
Case No. 1:21-cv-08665-JHR-AMD
Our File No. 16,993

Dear Judge Donio:

On April 8, 2021, defendant Callaway filed a Notice to remove the above-captioned matter to the Federal District Court. The matter was scheduled for an initial conference on May 5, 2021 with Magistrate Judge Matthew J. Skahill. On April 12, 2021, we received notice that the matter was reassigned to you and that the initial conference is rescheduled for May 4, 2021.

The purpose of this letter is to inform you that plaintiffs challenge defendant Callaway's Notice of Removal and will file a Motion to Remand and supporting brief by Friday, April 16, 2021. I would respectfully request that the scheduling conference set for May 4, 2021 be adjourned until disposition of our motion. I have spoken with Mr. Weininger and he consents to the requested adjournment. Thank you.

Respectfully submitted,

JACOBS & BARBONE, P.A.


Edwin J. Jacobs, Jr.

EJJ:lsg

cc: Daniel W. Weininger, Esquire
Marty & LaQuetta Small